



November 10, 2025

The Honourable Todd J. McCarthy, MPP  
Minister of Environment, Conservation and Parks  
5th Floor  
777 Bay St.  
Toronto, ON M7A 2J3

Dear Minister McCarthy,

On behalf of the Ontario Veterinary Medical Association (OVMA) and the over 5,500 veterinarians in the province, I would like to thank the Ministry of the Environment, Conservation and Parks for the opportunity to review and provide comments on *Developing guidance on section 16 activities under the Species Conservation Act, 2025* (ERO-025-0908) and *Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025* (ERO-025-0909).

Animal welfare issues are important, not only to veterinarians, pet owners and producers, but to the public at large. With the introduction of *the Species Conservation Act, 2025* (SCA), we note a shift from prohibiting activities to allowing them via registration with the Ministry, or Ministry approval. As our members are advocates of the health and welfare of animals, OVMA reviewed the proposed changes to enable *the Species Conservation Act, 2025* (SCA) and would like to provide the following feedback on both ERO-025-0908 and ERO-025-0909:

**Response to Developing Guidance on Section 16 Activities Under the *Species Conservation Act, 2025* (ERO-025-0908):**

- **Prohibitions on Activities should remain consistent with Section 9(1)(a) of the former *Endangered Species Act*.** While Section 16 of the new SCA will establish a new framework for regulating activities that may impact protected species, permitting the killing, harming, or capturing of Ontario's extirpated, endangered or threatened species is inconsistent with the proposed amended purpose of the Act, to protect species at risk. It is essential that the new regulatory framework remain consistent with Ontario's former obligations under Section 9(1)(a) of the *Endangered Species Act*. The provision states that "*no person shall, kill, harm, capture or take a living member of a species that is listed on the Species at Risk in Ontario List as an extirpated, endangered or threatened species.*" Maintaining these protections under

the new regulatory framework will ensure that the province continues to uphold its commitment to protecting at-risk species and to preserving the environment.

- **Veterinarians should be consulted on changes related to the Protected Species in Ontario List.** With the proposed changes to Section 16 and the Protected Species in Ontario List, it is vital that species assessments include veterinary expertise. Veterinarians bring specialized knowledge in animal health and the One Health perspective. The profession's involvement can help to better evaluate the long-term sustainability and welfare of at-risk species. In addition, evaluations should consider behavioural, social, and environmental considerations to ensure that designations are comprehensive. Including veterinary input will strengthen the decision-making process and support the protection of at-risk species.

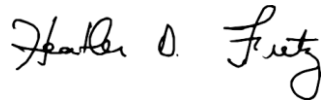
**Response to Proposed Legislative and Regulatory Amendments to Enable the *Species Conservation Act*, 2025 (ERO-025-0909):**

- **The proposed Permit Regulation threatens the long-term sustainability of Ontario's wildlife and ecosystems.** The long-term sustainability of Ontario's wildlife and ecosystems will be at risk by permitting registrants to kill endangered species, regardless of ministerial approval. This approach will accelerate species and ecosystem destruction. Killing protected species in Ontario will have broader economic impacts, including disruptions to ecosystems that support industries such as agriculture, forestry, tourism, and fisheries, potentially leading to long-term financial losses and reduced biodiversity-related services. As veterinarians are committed to animal welfare and the public interest, we urge the Ministry to rely on the regulatory framework to prevent the killing of any species listed on the Protected Species in Ontario List.
- **Maintain advisory groups and include veterinarians on the Committee on Status of Species at Risk in Ontario (COSSARO).** To support evidence-based species designations under the new *Species Conservation Act*, it is critical that advisory bodies like the Species at Risk Program Advisory Committee remain active. The Ministry should also include veterinarians on COSSARO and future advisory committees, given the profession's expertise in species health, population viability, and the impacts of human activity on wildlife. Veterinarian participation on these advisory groups would strengthen scientific assessments and ensure decisions reflect animal welfare, ecological and public health considerations creating trust and transparency with the public.

We would welcome the opportunity to advance discussions on this issue with you and Ministry staff. Working closely together, we are optimistic that we can address issues of common concern and strengthen Ontario's new legislation. Should you have any questions regarding this letter, please

contact OVMA's Manager of Government Relations and External Relations, Brandi Deimling at 1-800-670-1702 ext. 224 or [bdeimling@ovma.org](mailto:bdeimling@ovma.org).

Sincerely,

A handwritten signature in black ink that reads "Heather D. Fretz". The signature is written in a cursive style with a large, looped 'H' and 'F'.

Dr. Heather Fretz, DVM  
President